Electronically Filed
Docket: 24-CCB-0214
Filing Date: 05/26/2026 04:35:19 PM EDT

---------- Forwarded message ---------
From: **Shahid Anwar** <shahidanwaaar@gmail.com>
Date: Tue, Jul 8, 2025 at 6:07 PM
Subject: Fwd: [6VK7ZGMJ5MMOVGHR2VGO4JI3NI] YouTube Copyright Complaint Submission
To: Shahid Anwar <contact@shahidllc.us>

---------- Forwarded message ---------
From: **YouTube Copyright** <youtube-disputes+3ux223sg6hc3a07@google.com>
Date: Thu, Jun 6, 2024 at 5:25 AM
Subject: [6VK7ZGMJ5MMOVGHR2VGO4JI3NI] YouTube Copyright Complaint Submission
To: <shahidanwaaar@gmail.com>

Hi Shahid Anwar,

Thank you for your removal request. We've reviewed it and provided updates below.

Request resolved

The content listed below has been removed.

Videos in question:

https://www.youtube.com/watch?v=EGFkAfUdBt8

We use a combination of automated systems and human reviews to process removal requests.

You may take back your claim of copyright infringement at any time if you change



your mind.

- The YouTube Team

Here is the information you filled in:

Copyright Owner Name (Company Name if applicable): Shahid Anwar
Your Full Legal Name (Aliases, usernames or initials not accepted): shahid anwar
Your Title or Job Position (What is your authority to make this complaint?): owner
Address:
22621 amendola terrace apt 222
Ashburn , Va 20148
US
Username: Shahid Anwar
Email Address: shahidanwaaar@gmail.com
Phone: (571) 888-6185
URL of allegedly infringing video to be removed: https://www.youtube.com/watch?v=EGFkAfUdBt8
Describe the work allegedly infringed: My video

- Title of video: shahid anwar tiktok
- Source of video: https://www.tiktok.com/@_shahidanwarllc.com/video/7375963078904515883?lang=en
- Type of video: Internet video
- Where does the content appear? Entire video

Country where copyright applies: US
I state UNDER PENALTY OF PERJURY that:

- I am the owner, or an agent authorized to act on behalf of the owner of an exclusive right that is allegedly infringed.
- I have a good faith belief that the use of the material in the manner complained of is not authorized by the copyright owner, its agent, or the law; and
- This notification is accurate.
- I acknowledge that under Section 512(f) of the DMCA any person who knowingly materially misrepresents that material or activity is infringing may be subject to liability for damages.
- I understand that abuse of this tool will result in termination of my YouTube channel.

Authorized Signature: shahid anwar

Help Center • Email Options

You received this email to provide information and updates around your YouTube channel or account.

© 2021 Google LLC d/b/a YouTube, 901 Cherry Ave, San Bruno, CA 94066

On Jun 5, 2024 YouTube Copyright

Copyright Infringement Notification Confirmation

Thank you for submitting a copyright takedown request. Your request will be reviewed to make sure it's valid and includes all required elements.

In your request, you have asked that we remove the videos and prevent any copies from being uploaded in the future. We'll reply to this email when we've taken action on your request.

To check the status of your takedown request, go to the 'Removal requests' tab in YouTube Studio's Copyright page. From here, you can also turn off the "Prevent copies" feature. This is the feature that makes best efforts to prevent copies of the videos you asked us to remove from being reuploaded to YouTube.

Keep in mind that this feature should only be selected when you have exclusive worldwide rights to the content specified in your takedown request.

Here is the information you gave us:

- Copyright Owner Name (Company Name if applicable): Shahid Anwar
- Your Full Legal Name (Aliases, usernames or initials not accepted): shahid anwar
- Your Title or Job Position (What is your authority to make this complaint?): owner
- Address:
  - 22621 amendola terrace apt 222
  - Ashburn , Va 20148
  - US
- Username: Shahid Anwar
- Email Address: shahidanwaaar@gmail.com
- Phone: (571) 888-6185
- URL of allegedly infringing video to be removed: https://www.youtube.com/watch?v=EGFkAfUdBt8
- Describe the work allegedly infringed: My video
  - Title of video: shahid anwar tiktok

Source of video:
https://www.tiktok.com/@_shahidanwarllc.com/video/7375963078904515883?lang=en
    - Type of video: Internet video
    - Where does the content appear? Entire video

- Country where copyright applies: US
- I state UNDER PENALTY OF PERJURY that:
    - I am the owner, or an agent authorized to act on behalf of the owner of an exclusive right that is allegedly infringed.
    - I have a good faith belief that the use of the material in the manner complained of is not authorized by the copyright owner, its agent, or the law; and
    - This notification is accurate.
    - I acknowledge that under Section 512(f) of the DMCA any person who knowingly materially misrepresents that material or activity is infringing may be subject to liability for damages.
    - I understand that abuse of this tool will result in termination of my YouTube channel.
- Authorized Signature: shahid anwar

- The YouTube Team

Help Center • Email Options

You received this email to provide information and updates around your YouTube channel or account.

© 2021 Google LLC d/b/a YouTube, 901 Cherry Ave, San Bruno, CA 94066

On Jun 5, 2024 shahidanwaaar@gmail.com wrote:

Video IDs: EGFkAfUdBt8

---------- Forwarded message ---------
From: **Shahid Anwar** <shahidanwaaar@gmail.com>
Date: Tue, Jul 8, 2025 at 6:06 PM
Subject: Fwd: [PHYSZMN3CYMJZUPAV6SXPTLVAI] YouTube Copyright Complaint Submission
To: Shahid Anwar <contact@shahidllc.us>

---------- Forwarded message ---------
From: **YouTube Copyright** <youtube-disputes+1zceywzhj7njm07@google.com>
Date: Sat, Jun 8, 2024 at 9:56 AM
Subject: [PHYSZMN3CYMJZUPAV6SXPTLVAI] YouTube Copyright Complaint Submission
To: <shahidanwaaar@gmail.com>

Hi Shahid Anwar,

Thank you for your removal request. We've reviewed it and provided updates below.

Request resolved

The content listed below has been removed.

Videos in question:

https://www.youtube.com/watch?v=htraakMuOJY

We use a combination of automated systems and human reviews to process removal requests.

EXHIBIT 2

You may take back your claim of copyright infringement at any time if you change your mind.

- The YouTube Team

Here is the information you filled in:

Copyright Owner Name (Company Name if applicable): Shahid Anwar
Your Full Legal Name (Aliases, usernames or initials not accepted): SHAHID ANWAE
Your Title or Job Position (What is your authority to make this complaint?): OWNER
Address:
22621 amendola terrace apt 222
Ashburn , Va 20148
US
Username: Shahid Anwar
Email Address: shahidanwaaar@gmail.com
Phone: (571) 888-6185
URL of allegedly infringing video to be removed: https://www.youtube.com/watch?v=htraakMuOJY
Describe the work allegedly infringed: My video

- Title of video: SHAHID ANWAR TOKTOK
- Source of video: https://www.tiktok.com/@_shahidanwarllc.com/video/7375299693502516526?lang=en
- Type of video: Internet video
- Where does the content appear?
  The content appears in the targeted video from 0:00:34 to 0:00:41 : https://www.youtube.com/watch?v=htraakMuOJY&t=34
  It appears in your source video: https://www.tiktok.com/@_shahidanwarllc.com/video/7375299693502516526?lang=en

Country where copyright applies: US
I state UNDER PENALTY OF PERJURY that:

- I am the owner, or an agent authorized to act on behalf of the owner of an exclusive right that is allegedly infringed.
- I have a good faith belief that the use of the material in the manner complained of is not authorized by the copyright owner, its agent, or the law; and

This notification is accurate.

- I acknowledge that under Section 512(f) of the DMCA any person who knowingly materially misrepresents that material or activity is infringing may be subject to liability for damages.
- I understand that abuse of this tool will result in termination of my YouTube channel.

Authorized Signature: SHAHID ANWAE

Help Center • Email Options

You received this email to provide information and updates around your YouTube channel or account.

© 2021 Google LLC d/b/a YouTube, 901 Cherry Ave, San Bruno, CA 94066

On Jun 8, 2024 YouTube Copyright

Copyright Infringement Notification Confirmation

Thank you for submitting a copyright takedown request. Your request will be reviewed to make sure it's valid and includes all required elements.

In your request, you have asked that we remove the videos and prevent any copies from being uploaded in the future. We'll reply to this email when we've taken action on your request.

To check the status of your takedown request, go to the 'Removal requests' tab in YouTube Studio's Copyright page. From here, you can also turn off the "Prevent copies" feature. This is the feature that makes best efforts to prevent copies of the videos you asked us to remove from being reuploaded to YouTube.

Keep in mind that this feature should only be selected when you have exclusive worldwide rights to the content specified in your takedown request.

Here is the information you gave us:

- Copyright Owner Name (Company Name if applicable): Shahid Anwar
- Your Full Legal Name (Aliases, usernames or initials not accepted): SHAHID ANWAE
- Your Title or Job Position (What is your authority to make this complaint?): OWNER
- Address:
  - 22621 amendola terrace apt 222

Ashburn , Va 20148
    - US
- Username: Shahid Anwar
- Email Address: shahidanwaaar@gmail.com
- Phone: (571) 888-6185
- URL of allegedly infringing video to be removed: https://www.youtube.com/watch?v=htraakMuOJY
- Describe the work allegedly infringed: My video
    - Title of video: SHAHID ANWAR TOKTOK
    - Source of video: https://www.tiktok.com/@_shahidanwarllc.com/video/7375299693502516526?lang=en
    - Type of video: Internet video
    - Where does the content appear?
      The content appears in the targeted video from 0:00:34 to 0:00:41 : https://www.youtube.com/watch?v=htraakMuOJY&t=34
      It appears in your source video: https://www.tiktok.com/@_shahidanwarllc.com/video/7375299693502516526?lang=en

- Country where copyright applies: US
- I state UNDER PENALTY OF PERJURY that:
    - I am the owner, or an agent authorized to act on behalf of the owner of an exclusive right that is allegedly infringed.
    - I have a good faith belief that the use of the material in the manner complained of is not authorized by the copyright owner, its agent, or the law; and
    - This notification is accurate.
    - I acknowledge that under Section 512(f) of the DMCA any person who knowingly materially misrepresents that material or activity is infringing may be subject to liability for damages.
    - I understand that abuse of this tool will result in termination of my YouTube channel.
- Authorized Signature: SHAHID ANWAE

- The YouTube Team

Help Center • Email Options

You received this email to provide information and updates around your YouTube channel or account.

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On Jun 8, 2024 shahidanwaaar@gmail.com wrote:

Video IDs: htraakMuOJY

Micheli, Natalia

From: YouTube Copyright <youtube-disputes+1sc5w7ukbfvmf0q@google.com>
Sent: Sunday, February 8, 2026 10:14 PM
To: Micheli, Natalia
Subject: RE: Takedown notice confirmation Inquiry

Hello,

Thank you for your message.

Below is a copy of the notification in question. Please note the complainant's physical address and phone number have been redacted.

[BEGIN COPY OF NOTICE]

Here is the information you gave us:

-
  - Copyright Owner Name (Company Name if applicable): Shahid Anwar
  - Your Full Legal Name (Aliases, usernames or initials not accepted): shahid anwar
  - Your Title or Job Position (What is your authority to make this complaint?): owner
  - Username: Shahid Anwar
  - Email Address: shahidanwaaar@gmail.com

  - URL of allegedly infringing video to be removed: https://www.youtube.com/watch?v=aByo-FYXLw0
  - Describe the work allegedly infringed: My video
    - Title of video: shahid anwar tiktok
    - Source of video: https://www.tiktok.com/@_shahidanwarllc.com/video/7375963078904515883?lang=en
    - Type of video: Internet video
    - Where does the content appear?
      The content appears in the targeted video from 0:00:01 to 0:00:08 : https://www.youtube.com/watch?v=aByo-FYXLw0&t=1
      It appears in your source video: https://www.tiktok.com/@_shahidanwarllc.com/video/7375963078904515883?lang=en

- Country where copyright applies: US
- I state UNDER PENALTY OF PERJURY that:



    - I am the owner, or an agent authorized to act on behalf of the owner of an exclusive right that is allegedly infringed.
    - I have a good faith belief that the use of the material in the manner complained of is not authorized by the copyright owner, its agent, or the law; and
    - This notification is accurate.
    - I acknowledge that under Section 512(f) of the DMCA any person who knowingly materially misrepresents that material or activity is infringing may be subject to liability for damages.
    - I understand that abuse of this tool will result in termination of my YouTube channel.
- Authorized Signature: shahid anwar

- The YouTube Team

[END COPY OF NOTICE]

Sincerely,
The YouTube Team

From: Saad Hashmani
To: Kenneth Caldwell
Subject: Fwd: [Copyright takedown notice] Your YouTube account has been disabled
Date: Monday, July 15, 2024 7:43:38 PM

Original email

---------- Forwarded message ---------
From: **xROCKSTARx** <abdrockstar123@gmail.com>
Date: Mon, Jul 15, 2024, 7:38 PM
Subject: Fwd: [Copyright takedown notice] Your YouTube account has been disabled
To: saadahashmani@gmail com <saadahashmani@gmail.com>

---------- Forwarded message ---------
From: **YouTube** <no-reply@youtube.com>
Date: Sat, Jun 8, 2024, 12:56 AM
Subject: [Copyright takedown notice] Your YouTube account has been disabled
To: <peoplescatalyst-0250@pages.plusgoogle.com>

Hi Saad Hashmani Shorts,

Due to multiple **copyright strikes** associated with the videos below, your YouTube channel has now been terminated:

Video title: He changed Gareebo#shorts #saadhashmani #motivation #MusaKhana
Video URL: https://www.youtube.com/watch?v=htraakMuOJY
Content used: SHAHID ANWAR TOKTOK
Content found during: 0:00:34 – 0:00:41
Removal request issued by: Shahid Anwar
Contact info: shahidanwaaar@gmail.com

Video title: Shahid Anwar Software Update #shorts #saadhashmani #Saad #Hashmani #motivation #junaidakrampodcast
Video URL: https://www.youtube.com/watch?v=EGFkAfUdBt8
Content used: shahid anwar tiktok
Content found in: Entire video

EXHIBIT
tabbies
4

Removal request issued by: Shahid Anwar
Contact info: shahidanwaaar@gmail.com

Video title: Sabky Level Niklegy #shorts #saadhashmani #saad #hashmani #motivation #MusaKhana
Video URL: https://www.youtube.com/watch?v=aByo-FYXLw0
Content used: shahid anwar tiktok
Content found during: 0:00:01 – 0:00:08
Removal request issued by: Shahid Anwar
Contact info: shahidanwaaar@gmail.com

Why this can happen

- One or more of your videos contained copyrighted content.
- Copyright owners can choose to issue legal complaints that require YouTube to take down videos that contain their content.
- When you have three or more copyright strikes, your channel can be terminated.

VIEW DETAILS

How we process requests to remove content

We use a combination of **automated systems and human reviews** to process removal requests.

What to do next

- If you believe that you're not at fault in one or more of the instances above, you can appeal this removal by submitting a **counter notification.** You won't be able to submit a counter notification in YouTube Studio, but you can still submit a counter notification by **email, fax or post.** There may be severe legal consequences for submitting a counter notification with false information.
- You can also contact the party that removed your video and ask them to

retract their removal request.

- **Learn more about your resolution options.**

Thanks,
The YouTube Team

You received this email to provide information and updates around your YouTube channel or account.



©2024 Google LLC d/b/a YouTube, 901 Cherry Ave, San Bruno, CA 94066

From: xROCKSTARx
To: Kenneth Caldwell
Subject: Fwd: [IWVDXRNFIYNIXHJ3PIHIGMOJRU] New Copyright Counter Notification
Date: Tuesday, July 23, 2024 7:31:13 PM

---------- Forwarded message ---------
From: **YouTube Copyright** <youtube-disputes+3fruexmkqlhbf0h@google.com>
Date: Tue, Jul 23, 2024, 1:30 AM
Subject: Re: [IWVDXRNFIYNIXHJ3PIHIGMOJRU] New Copyright Counter Notification
To: <abdrockstar123@gmail.com>

Dear Saad Hashmani Shorts,

Thank you for your counter notification. Unfortunately, it's unclear to us whether you have a valid reason for filing a counter notification, so we won't be able to honor your request.

Counter notifications are only used when content has been removed as a result of mistake or misidentification. This includes a belief that your content is covered by copyright limitations or exceptions, such as fair use, fair dealing, or uses for the purposes of quotation, criticism, review, caricature, parody, or pastiche. Keep in mind that using this process may result in the claimant commencing legal action against you for copyright infringement, so you may wish to evaluate your legal position before filing a counter notification.

What you can do now

- Ask the copyright holder for a retraction or simply wait for your strike to expire.
- If you are sure that your video has been misidentified as infringing and are willing to possibly defend the action brought against you by the copyright holder, you can resubmit your counter notification. Be sure to explain in detail how you have all necessary rights to the video's content.

If you don't know or want more information about copyright, visit our Help Center. You may also wish to ask your legal counsel to determine if your video infringes someone else's copyright.

- The YouTube Team

Counter Notification as follows:

Videos included in counter notification:

- http://www.youtube.com/watch?v=EGFkAfUdBt8



- http://www.youtube.com/watch?v=aByo-FYXLw0
- http://www.youtube.com/watch?v=htraakMuOJY

Display name of uploader: Saad Hashmani Shorts

I consent to the sharing of this information with Claimant.

1. Identification of the material that has been removed or to which access has been disabled:

- http://www.youtube.com/watch?v=EGFkAfUdBt8
- http://www.youtube.com/watch?v=aByo-FYXLw0

  http://www.youtube.com/watch?v=htraakMuOJY

2. Statement of good faith belief:

I, xROCKSTARx , hereby state under penalty of perjury that I have a good faith belief that the material was removed or disabled as a result of a mistake or misidentification of the material to be removed or disabled.

xROCKSTARx's Statement:

Use of the content falls under fair use as defined in Section 107 of the Copyright Act of 1976. A small part of the video was extracted from an instagram reel which falls under fair use.. My usage qualifies as fair use because it is for the purpose of criticism and commentary, which are protected categories. Additional proof may be provided if needed.

I have initiated a legal proceeding against Shahid Anwar before the Copyright Claims Board ("CCB").

- Date: 07/19/2024 07:07 AM EDT
- Docket: 24-CCB-0214
- Caption: Hashmani v. Anwar, et al

My attorney is Kenneth N Caldwell and you may communicate with him directly concerning this matter.

Caldwell Law Firm, P.C.

8708 Technology Forest Pl., Ste. 175

The Woodlands, TX 77381.

kcaldwell@caldwell-law-firm.com

(302) 588-3834

3. Consent to jurisdiction:

I consent to the jurisdiction of the Federal District Court for the judicial district in which my address is located, or if my address is outside of the United States, the judicial district in which the service provider may be found.

4. Agreement to accept service of process:

I will accept service of process from the person who provided the original DMCA Takedown Notice or an agent of such person.

5. Contact information:

My attorney's contact information is:

Kenneth N Caldwell

Caldwell Law Firm, P.C.

8708 Technology Forest Pl., Ste. 175

The Woodlands, TX 77381.

kcaldwell@caldwell-law-firm.com

(302) 588-3834

6. Signature:

I, xROCKSTARx , declare under penalty of perjury that the information in this Counter Notice is accurate and that I am the owner or authorized to act on behalf of the owner of the removed or disabled content.

I swear, under penalty of perjury, that I have a good faith belief the material was removed due to a mistake or misidentification of the material to be removed or disabled.

I consent to the jurisdiction of the Federal District Court for the district in which my address is located, or if my address is outside of the United States, the judicial district in which YouTube is located, and will accept service of process from the claimant.

abdrockstar123@gmail.com

Help Center • Email Options

You received this email to provide information and updates around your YouTube channel or account.



© 2021 Google LLC d/b/a YouTube, 901 Cherry Ave, San Bruno, CA 94066

Video URL: https://www.youtube.com/watch?v=htraakMuOJY

Content found during: 0:00:34 – 0:00:41

1. Is the video your own original content and do you own all the rights to it?

Yes, the video is my own original content, and I own all the rights to it.

2. If you've used someone else's copyrighted work, can you provide evidence of a license or permission for that content?

No I have not used anyone's copyrighted work

3. Is your use of the content protected by fair use, fair dealing, or a similar exception to copyright?

Yes, my use of the content falls under fair use as defined in Section 107 of the Copyright Act of 1976. My usage qualifies as fair use because it is for the purpose of criticism and commentary, which are protected categories. Fair use is a use permitted by copyright statutes that might otherwise be infringing. Additionally, the use is non-profit and educational, which supports the case for fair use.

4. Is the content in the public domain?

Yes, it is in the public domain. A small part of the video was extracted from an instagram reel which was in the public domain. The link of the mentioned reel is pasted below:

Used from : https://www.instagram.com/reel/C7pnm86J9Lk/ .

This was a reel posted from the instagram Link below:

https://www.instagram.com/shahidanwarllc/

Video URL: https://www.youtube.com/watch?v=EGFkAfUdBt8
Content used: shahid anwar tiktok
Content found in: Entire video

1. Is the video your own original content and do you own all the rights to it?

Yes, the video is my own original content, and I own all the rights to it.

2. If you've used someone else's copyrighted work, can you provide evidence of a license or permission for that content?

No I have not used anyone's copyrighted work

3. Is your use of the content protected by fair use, fair dealing, or a similar exception to copyright?

Yes, my use of the content falls under fair use as defined in Section 107 of the Copyright Act of 1976. My usage qualifies as fair use because it is for the purpose of criticism and commentary, which are protected categories. Fair use is a use permitted by copyright statutes that might otherwise be infringing. Additionally, the use is non-profit and educational, which supports the case for fair use.

4. Is the content in the public domain?

Yes, it is in the public domain. A small part of the video 0:00:17 – 0:00:27

was extracted from an instagram reel which was in the public domain. The link of the mentioned reel is pasted below:

Used from : https://www.instagram.com/reel/C7pnm86J9Lk/

This was a reel posted from the instagram Link below:

https://www.instagram.com/shahidanwarllc/

Video URL: https://www.youtube.com/watch?v=aByo-FYXLw0
Content used: shahid anwar tiktok
Content found during: 0:00:01 – 0:00:08

1. Is the video your own original content and do you own all the rights to it?

Yes, the video is my own original content, and I own all the rights to it.

2. If you've used someone else's copyrighted work, can you provide evidence of a license or permission for that content?

No I have not used anyone's copyrighted work

3. Is your use of the content protected by fair use, fair dealing, or a similar exception to copyright?

Yes, my use of the content falls under fair use as defined in Section 107 of the Copyright Act of 1976. My usage qualifies as fair use because it is for the purpose of criticism and commentary, which are

protected categories. Fair use is a use permitted by copyright statutes that might otherwise be infringing. Additionally, the use is non-profit and educational, which supports the case for fair use.

4. Is the content in the public domain?

Yes, it is in the public domain. A small part of the video 0:00:01 – 0:00:08

was extracted from an instagram reel which was in the public domain. The link of the mentioned reel is pasted below:

Used from : https://www.instagram.com/reel/C7uOTnzpwnR/

This was a reel posted from the instagram Link below:

https://www.instagram.com/shahidanwarllc/

COPYRIGHT
CLAIMS BOARD

CCB STANDARD WRITTEN QUESTIONS
("INTERROGATORIES")

Interrogatories to Be Answered by Parties Defending Against a Misrepresentation Claim

During the **discovery** stage of a Copyright Claims Board (CCB) proceeding, the CCB directs parties to exchange—with each other but not the CCB—(1) answers to a standard set of questions issued by the CCB ("standard interrogatories") and (2) documents identified in a set of standardized document requests issued by the CCB ("document requests"). **Each party must respond to the requests truthfully and provide the requested documents over which they have control.**

This information concerns the CCB's standard set of Interrogatories. The questions themselves, *as well as a certification you must sign*, can be found after the rules described below. **Provide answers to these questions to the other party(ies) if you are asserting *a claim or counterclaim* of misrepresentation in a CCB proceeding** in a *takedown notice or counter-notice under* ***17 U.S.C. § 512(f)*** in a CCB proceeding.

The questions and certifications follow the background information. You may use the fillable fields provided or type your answers in a separate document.

General Rules for Interrogatories

In a legal proceeding, each side has information and knowledge important to the case. When parties present their positions and evidence to the CCB, neither side should be surprised at what they are seeing or hearing. Therefore, the CCB has developed standard questions ("interrogatories") that each party must answer and then serve their answers on the other parties by the deadline set by the CCB in their case.

EXHIBIT
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Answering Interrogatories and Updating Your Answers

Respond to each interrogatory separately and completely. Each answer must be as complete and straightforward as the information reasonably available to you permits, including information possessed by your attorneys, employees, or other agents. If you cannot answer any interrogatory in full, respond as fully as possible, explain why you cannot answer the rest, and state whatever information you have about the unanswered portion.

You have an obligation to update your interrogatory answers throughout this proceeding. If you discover or learn new or updated information that changes any of your answers, you must serve updated answers to the other parties as soon as practical.

How to Produce Your Interrogatory Answers to the Other Parties

Unless the parties agree to other terms in writing (or something different is ordered by the CCB):

- You may use the standard interrogatory form created by the CCB or you may separately type out each interrogatory and then type your answer below each interrogatory.
- You must produce your interrogatory answers by email, unless for some unlikely reason, their size and format makes such service reasonably possible. If that unlikely event occurs, confer with the other parties to agree to other arrangements, and if the parties cannot agree to other arrangements, send the interrogatory answers by U.S. first class or priority mail.

Whenever you answer interrogatories, you must certify that your answers are truthful and complete to the best of your knowledge. That certification will be on the CCB's standard form. If you are not using the CCB's standard form, you must copy the CCB standard interrogatory certification at the bottom of your interrogatory answers.

To Whom You Should Produce Interrogatory Answers

Your production is effective (it counts) when you send it unless you learn that it did not reach the other party.

- If the party is **represented by a lawyer or other authorized represented,** you must send the answers to that lawyer or representative.
- If the party is **self-represented,** you must send the answers directly to that party.

Use the email address provided to you by the other party or representative. If none has been provided, use the email address provided in the claim, response, or in their eCCB user information, as provided by the CCB, unless the CCB orders you to serve the party directly. Interrogatory answers should generally be provided by email unless the parties have agreed on another arrangement or the size or format of what is being sent makes that not practical.

Any interrogatory answers and other responses to any other discovery requests **shall not be filed with the CCB at this time**. You should only file a party's interrogatory answer or documents produced in discovery as part of *written testimony*, as needed as attachments to your other filings, or otherwise ordered by the CCB.

Confidential Communications

Any confidential communications with your legal counsel (including a lawyer, in-house counsel, or authorized law school representative) reflecting or seeking legal advice about the merits of the

proceeding or other legal issue are considered privileged communications, which means that you do not have to provide your lawyer's legal advice as part of your answer to an interrogatory, although you must note if you are withholding such information as privileged in case the other party/parties disputes that the information is privileged.

Preserving Materials and Updating Your Answers

You must preserve all material relevant and significant to your case. Do not destroy or dispose of documents or other materials related to your claim or defense against a claim. This is true throughout the CCB proceeding. If you answer an interrogatory **and then you find new information or realize you made a mistake, you must send updated answers to the other parties as soon as practical.**

Discovery Sanctions

If you do not comply with the discovery requests, the other party may raise the issue with the CCB. If the CCB orders you to comply but you remain noncompliant, it may ultimately impose **sanctions** on you. Those sanctions may include the CCB adopting an **adverse inference** against you about the facts related to the discovery you should have produced. The CCB may also consider any discovery sanctions as it considers awarding attorney's fees and costs against you as part of a final determination. You can avoid these concerns by producing everything that is required, including answering interrogatories truthfully and completely to the best of your knowledge.

Interrogatories that Must Be Answered by a Party Defending Against a Misrepresentation Claim

You must answer the following interrogatories and send the other party(ies) your answers by the deadline set by the CCB in the scheduling order. You may use this form to enter your answers (and may attach additional well-labeled pages as needed). If you would rather type out the answers in a separate document, you can do so by copying the questions and certification exactly, and typing your answers under each question. Be as detailed as you can in answering each of these interrogatories:

1. Give the full name of each person you plan to use in the proceeding as a **witness**. Include their phone number, mailing address, and email address, if you know it. Include a brief description of the topics on which they may give a witness statement in this proceeding.

N/A other than the parties to this action. The parties have knowledge of the underlying facts as well as the contents of the videos created/used.

2. Name any other person who may have important information related to the claims, counterclaims, or defenses in the proceeding. Include their phone number, mailing address, and email address, if you know it.

Google/YouTube: copyright@youtube.com

3. Is any agreement or other relationship between the parties relevant to the claim? If yes, describe the agreement or other relationship.

N/A

4. Are you aware of any relevant document that exists or once existed, that is **responsive** to a **request for the production of documents**, but that is not in your possession? If yes, for each such document, provide a summary of its contents and, if it was once in your possession, explain when and why it was disposed, destroyed, lost, or otherwise became unavailable.

Shahid Anwar's TikTok videos used.

5. The other party(ies) has alleged you made a misrepresentation in a takedown notice or counter-notice sent to an online service provider. Describe in detail:

   a. Why you believe everything in you wrote in your takedown notice or counter-notice was true. To the extent the claim or counterclaim for misrepresentation alleges which words the other party(ies) believes were false or inaccurate, describe in particular why those words were true or correct.

My YouTube channel has 1.3 million subscribers, and my TikTok has 1.5 million subscribers. The other party took my TikTok videos and used them in his videos to disparage my University, The Shahid University, which is available on the App Store. YouTube provided a notification that it detected a copyright match to my videos in videos of the Complainant, Saad Hashmani, in his YouTube channel, and based on the prompt, I submitted the takedown notice for removal of the videos of the Complainant, Saad Hashmani, which contained my videos noted by YouTube as a copyright match. Following my takedown notice, YouTube removed the videos of the Complainant, Saad Hashmani, from his YouTube channel. I understand the right use of someone's video to comment on, but in this case, the other party used my videos to defame my business and offer his services to the audience instead.

Otherwise, no specific words are identified by the other party as false or inaccurate in its Claim.

   b. If applicable to you, why, if any words in your takedown notice or counter-notice were false or inaccurate, you believe those words were not important to the online service provider's taking down of material (for misrepresentation in a takedown notice) or putting back up of material (for misrepresentation in a counter-notice).

N/A

c. If applicable to you, why, if any words in your takedown notice or counter-notice were false or inaccurate, you did not know the words were false or inaccurate when you sent the takedown notice or counter-notice.

N/A

6. Describe all communications you have had with the online service provider related to the takedown notice and/or counter-notice at issue in this proceeding.

I got a notification from YouTube on my YouTube Creator Studio that YouTube detected a copyright match to my videos and I submitted the takedown notice for removal through my Dashboard.

7. Describe all communications you have had with the other party(ies) or with third-parties related to the takedown notice and/or counter-notice at issue in this proceeding.

I do not even know this person. He came up on social media and started to disparage me to gain followers and then launched his own course and was using my videos in the beginning in his videos to shift the customer to his platform instead.

8. If you issued a takedown notice, describe when and how you discovered the activities of the other party(ies) that made you decide to send a takedown notice to an online service provider.

My videos have a "prevent copies action" on YouTube. When someone uses my content, YouTube sends me a notification of matching copyright found.

9. If you issued a takedown notice, describe in detail your reasons for sending the takedown notice, including why you believe the other party(ies) were infringing your work(s).

YouTube provided me with notice that the other party used my TikTok videos and posted those in content on his YouTube channel. I submitted the takedown notice through YouTube's automatic notification system, which had sent me a notification of a copyright match, that identifies anyone that uses my videos in their YouTube channel.

10. If you issued a takedown notice, describe in detail how you created or came to own the copyright in the work(s) you alleged in the notice was infringed.

I created all of the content, including all original content and content included under license from others, in my TikTok videos, including those included in the content of the other party on his YouTube channel.

THIS IS HOW I GOT NOTIFIED FROM YOUTUBE

Channel copyright
Filter
Matching videos
Total views
Subscribers
% match
Date
Your content
Video thumbnail: Free Course Amazon selling products || Amazon || Shahid Anawar || Free Course || selling products
7:05
Free Course Amazon selling products || Amazon || Shahid Anawar || Free Course || selling products
by FREE LEARNING
5
112
100% of their video
May 7, 2025
SHAHID MNETORESHIP

11. If you issued a counter-notice, describe in detail your reasons for sending the counter-notice, including why you believe you were not infringing the other party's/parties' work(s).

N/A

12. If you issued a counter-notice, describe in detail how you created or why you had the rights to use the work(s) of yours that the other party(ies) claims is an infringement.

N/A

13. Describe any reasons you have for believing the other party(ies) suffered no harm as a result of the misrepresentation at issue in this proceeding or should not be granted some or any of the relief they have requested. Be as detailed as possible.

First, Hashmani did not identify any specific harm in his complaint nor a damage amount. He has not suffered harm because he was only soliciting business by using my communications with my subscribers and other viewers.

Additionally, even if he can identify any damage, it was not the fault of Respondent that YouTube did not bring his account back after Hashmani allegedly filed a counter-notice.

14. Review the Response you filed in this proceeding. For each defense you have checked in the Response Form, *as well as any other defenses you wish to raise,* list those defenses here, and separately for each one, describe in detail your basis for believing you have such a defense.

All Defenses:

The representations at issue were actually true

If any misrepresentations made were made, they were made unintentionally and not knowingly

Claimant was not harmed by the claimed misrepresentation

Responses have been made above as to all three defenses.

Certification of Discovery Responses

Please include a signed copy of this form with your discovery responses

I, Shahid Anwar , certify that the enclosed material is accurate, complete, and truthful to the best of my knowledge.

SHAHID ANWAR

5/15/2025

Signature **Date**

Glossary

- **Adverse inference:** A negative conclusion that's drawn from silence or the failure to provide responsive information.
- **Discovery:** The process by which the parties exchange information and documents relevant to the issues in the case.
- **Harm:** What the claimant has suffered or lost as a result of respondent's actions.
- **Privileged:** Any confidential communications with legal counsel reflecting or seeking legal advice about the merits of a proceeding or other legal issue.
- **Responsive:** Documents that are requested for production in response to discovery requests.
- **Request for the production of documents:** Written requests provided by the CCB that require parties to provide documents, other information, or evidence as part of discovery in an active proceeding.
- **Sanctions:** Penalties imposed by the CCB for misconduct during proceedings.
- **Witness:** Someone with personal knowledge about factual information that is relevant to the proceeding.

COPYRIGHT
CLAIMS BOARD

CCB STANDARD WRITTEN QUESTIONS
("INTERROGATORIES")

Interrogatories to Be Answered by Parties Defending Against a Misrepresentation Claim

During the **discovery** stage of a Copyright Claims Board (CCB) proceeding, the CCB directs parties to exchange—with each other but not the CCB—(1) answers to a standard set of questions issued by the CCB ("standard interrogatories") and (2) documents identified in a set of standardized document requests issued by the CCB ("document requests"). **Each party must respond to the requests truthfully and provide the requested documents over which they have control.**

This information concerns the CCB's standard set of Interrogatories. The questions themselves, *as well as a certification you must sign*, can be found after the rules described below. **Provide answers to these questions to the other party(ies) if you are asserting *a claim or counterclaim* of misrepresentation in a CCB proceeding** in a *takedown notice or counter-notice under* ***17 U.S.C. § 512(f)*** in a CCB proceeding.

The questions and certifications follow the background information. You may use the fillable fields provided or type your answers in a separate document.

General Rules for Interrogatories

In a legal proceeding, each side has information and knowledge important to the case. When parties present their positions and evidence to the CCB, neither side should be surprised at what they are seeing or hearing. Therefore, the CCB has developed standard questions ("interrogatories") that each party must answer and then serve their answers on the other parties by the deadline set by the CCB in their case.

EXHIBIT
7

Answering Interrogatories and Updating Your Answers

Respond to each interrogatory separately and completely. Each answer must be as complete and straightforward as the information reasonably available to you permits, including information possessed by your attorneys, employees, or other agents. If you cannot answer any interrogatory in full, respond as fully as possible, explain why you cannot answer the rest, and state whatever information you have about the unanswered portion.

You have an obligation to update your interrogatory answers throughout this proceeding. If you discover or learn new or updated information that changes any of your answers, you must serve updated answers to the other parties as soon as practical.

How to Produce Your Interrogatory Answers to the Other Parties

Unless the parties agree to other terms in writing (or something different is ordered by the CCB):

- You may use the standard interrogatory form created by the CCB or you may separately type out each interrogatory and then type your answer below each interrogatory.
- You must produce your interrogatory answers by email, unless for some unlikely reason, their size and format makes such service reasonably possible. If that unlikely event occurs, confer with the other parties to agree to other arrangements, and if the parties cannot agree to other arrangements, send the interrogatory answers by U.S. first class or priority mail.

Whenever you answer interrogatories, you must certify that your answers are truthful and complete to the best of your knowledge. That certification will be on the CCB's standard form. If you are not using the CCB's standard form, you must copy the CCB standard interrogatory certification at the bottom of your interrogatory answers.

To Whom You Should Produce Interrogatory Answers

Your production is effective (it counts) when you send it unless you learn that it did not reach the other party.

- If the party is **represented by a lawyer or other authorized represented,** you must send the answers to that lawyer or representative.
- If the party is **self-represented,** you must send the answers directly to that party.

Use the email address provided to you by the other party or representative. If none has been provided, use the email address provided in the claim, response, or in their eCCB user information, as provided by the CCB, unless the CCB orders you to serve the party directly. Interrogatory answers should generally be provided by email unless the parties have agreed on another arrangement or the size or format of what is being sent makes that not practical.

Any interrogatory answers and other responses to any other discovery requests **shall not be filed with the CCB at this time**. You should only file a party's interrogatory answer or documents produced in discovery as part of *written testimony*, as needed as attachments to your other filings, or otherwise ordered by the CCB.

Confidential Communications

Any confidential communications with your legal counsel (including a lawyer, in-house counsel, or authorized law school representative) reflecting or seeking legal advice about the merits of the

proceeding or other legal issue are considered privileged communications, which means that you do not have to provide your lawyer's legal advice as part of your answer to an interrogatory, although you must note if you are withholding such information as privileged in case the other party/parties disputes that the information is privileged.

Preserving Materials and Updating Your Answers

You must preserve all material relevant and significant to your case. Do not destroy or dispose of documents or other materials related to your claim or defense against a claim. This is true throughout the CCB proceeding. If you answer an interrogatory **and then you find new information or realize you made a mistake, you must send updated answers to the other parties as soon as practical.**

Discovery Sanctions

If you do not comply with the discovery requests, the other party may raise the issue with the CCB. If the CCB orders you to comply but you remain noncompliant, it may ultimately impose **sanctions** on you. Those sanctions may include the CCB adopting an **adverse inference** against you about the facts related to the discovery you should have produced. The CCB may also consider any discovery sanctions as it considers awarding attorney's fees and costs against you as part of a final determination. You can avoid these concerns by producing everything that is required, including answering interrogatories truthfully and completely to the best of your knowledge.

Interrogatories that Must Be Answered by a Party Defending Against a Misrepresentation Claim

You must answer the following interrogatories and send the other party(ies) your answers by the deadline set by the CCB in the scheduling order. You may use this form to enter your answers (and may attach additional well-labeled pages as needed). If you would rather type out the answers in a separate document, you can do so by copying the questions and certification exactly, and typing your answers under each question. Be as detailed as you can in answering each of these interrogatories:

1. Give the full name of each person you plan to use in the proceeding as a witness. Include their phone number, mailing address, and email address, if you know it. Include a brief description of the topics on which they may give a witness statement in this proceeding.

N/A other than the parties to this action. The parties have knowledge of the underlying facts as well as the contents of the videos created/used.

Supplemental Answer:

Shahid Anwar
amazonseller0060@gmail.com
571-317-9146

2. Name any other person who may have important information related to the claims, counterclaims, or defenses in the proceeding. Include their phone number, mailing address, and email address, if you know it.

Google/YouTube: copyright@youtube.com

3. Is any agreement or other relationship between the parties relevant to the claim? If yes, describe the agreement or other relationship.

N/A

4. Are you aware of any relevant document that exists or once existed, that is responsive to a request for the production of documents, but that is not in your possession? If yes, for each such document, provide a summary of its contents and, if it was once in your possession, explain when and why it was disposed, destroyed, lost, or otherwise became unavailable.

Shahid Anwar's TikTok videos used.

Supplemental Answer:

Respondent does not have copies of the alleged infringing videos.

Respondent does not recall which infringed videos exactly were used as this occurred a year ago and as a content creator, Respondent is consistently uploading and posting videos on several platforms at a time. However, Respondent will produce several videos that he believes may have been the infringed videos in question. Without the infringing videos, Respondent cannot be sure as to which videos of his were used.

Respondent will also produce the confirmation emails received for each of the three seperate take-down notices he filed through YouTube.

5. The other party(ies) has alleged you made a misrepresentation in a takedown notice or counter-notice sent to an online service provider. Describe in detail:

   a. Why you believe everything in you wrote in your takedown notice or counter-notice was true. To the extent the claim or counterclaim for misrepresentation alleges which words the other party(ies) believes were false or inaccurate, describe in particular why those words were true or correct.

My YouTube channel has 1.3 million subscribers, and my TikTok has 1.5 million subscribers. The other party took my TikTok videos and used them in his videos to disparage my University, The Shahid University, which is available on the App Store. YouTube provided a notification that it detected a copyright match to my videos in videos of the Complainant, Saad Hashmani, in his YouTube channel, and based on the prompt, I submitted the takedown notice for removal of the videos of the Complainant, Saad Hashmani, which contained my videos noted by YouTube as a copyright match. Following my takedown notice, YouTube removed the videos of the Complainant, Saad Hashmani, from his YouTube channel. I understand the right use of someone's video to comment on, but in this case, the other party used my videos to defame my business and offer his services to the audience instead.

Otherwise, no specific words are identified by the other party as false or inaccurate

   b. If applicable to you, why, if any words in your takedown notice or counter-notice were false or inaccurate, you believe those words were not important to the online service provider's taking down of material (for misrepresentation in a takedown notice) or putting back up of material (for misrepresentation in a counter-notice).

N/A

c. If applicable to you, why, if any words in your takedown notice or counter-notice were false or inaccurate, you did not know the words were false or inaccurate when you sent the takedown notice or counter-notice.

N/A

6. Describe all communications you have had with the online service provider related to the takedown notice and/or counter-notice at issue in this proceeding.

I got a notification from YouTube on my YouTube Creator Studio that YouTube detected a copyright match to my videos and I submitted the takedown notice for removal through my Dashboard.

7. Describe all communications you have had with the other party(ies) or with third-parties related to the takedown notice and/or counter-notice at issue in this proceeding.

I do not even know this person. He came up on social media and started to disparage me to gain followers and then launched his own course and was using my videos in the beginning in his videos to shift the customer to his platform instead.

8. If you issued a takedown notice, describe when and how you discovered the activities of the other party(ies) that made you decide to send a takedown notice to an online service provider.

My videos have a "prevent copies action" on YouTube. When someone uses my content, YouTube sends me a notification of matching copyright found.

Supplemental Answer:

Once Respondent received the notification of a matching copyright video, he watches the video to confirm, which is also a necessary step in order to identify the exact time-stamp of when the video was used as asked in the take down notice form.

This occurred on three separate occasions as YouTube flagged each of the Claimants videos, and Respondent watched and reported each one in accordance with the take-down notices.

9. If you issued a takedown notice, describe in detail your reasons for sending the takedown notice, including why you believe the other party(ies) were infringing your work(s).

YouTube provided me with notice that the other party used my TikTok videos and posted those in content on his YouTube channel. I submitted the takedown notice through YouTube's automatic notification system, which had sent me a notification of a copyright match, that identifies anyone that uses my videos in their YouTube channel.

10. If you issued a takedown notice, describe in detail how you created or came to own the copyright in the work(s) you alleged in the notice was infringed.

I created all of the content, including all original content and content included under license from others, in my TikTok videos, including those included in the content of the other party on his YouTube channel.

THIS IS HOW I GOT NOTIFIED FROM YOUTUBE

Channel copyright
Filter
Matching videos
Total views
Subscribers
% match
Date
Your content
Video thumbnail: Free Course Amazon selling products || Amazon || Shahid Anawar || Free Course || selling products
7:05
Free Course Amazon selling products || Amazon || Shahid Anawar || Free Course || selling products
by FREE LEARNING
5
112
100% of their video
May 7, 2025
SHAHID MNETORESHIP
Video thumbnail: Dropshipping Haram..? | Shahid Anwar Amazon Course | CJ Dropshipping Explained
10:11
Dropshipping Haram..? | Shahid Anwar Amazon Course | CJ Dropshipping Explained

11. If you issued a counter-notice, describe in detail your reasons for sending the counter-notice, including why you believe you were not infringing the other party's/parties' work(s).

N/A

12. If you issued a counter-notice, describe in detail how you created or why you had the rights to use the work(s) of yours that the other party(ies) claims is an infringement.

N/A

13. Describe any reasons you have for believing the other party(ies) suffered no harm as a result of the misrepresentation at issue in this proceeding or should not be granted some or any of the relief they have requested. Be as detailed as possible.

First, Hashmani did not identify any specific harm in his complaint nor a damage amount. He has not suffered harm because he was only soliciting business by using my communications with my subscribers and other viewers.

Additionally, even if he can identify any damage, it was not the fault of Respondent that YouTube did not bring his account back after Hashmani allegedly filed a counter-notice.

Supplemental Answer:

Between each take-down notice filed by Respondent, Complainant had the opportunity to reach out to Respondent to retract the take-down notice, but failed to do so. Copyright strikes expire after 90 days, so he had the opportunity to stop uploading videos with Respondent's content, but continued to do so with the risk of his channel being removed after the third strike. He also had the opportunity to appeal YouTube's decision, but to Respondent's knowledge he did not do so either.

14. Review the Response you filed in this proceeding. For each defense you have checked in the Response Form, *as well as any other defenses you wish to raise,* list those defenses here, and separately for each one, describe in detail your basis for believing you have such a defense.

All Defenses:

The representations at issue were actually true

If any misrepresentations made were made, they were made unintentionally and not knowingly

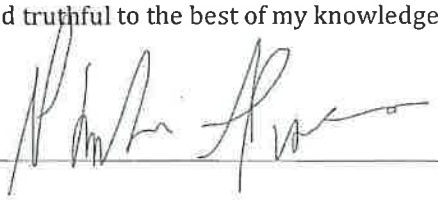
Claimant was not harmed by the claimed misrepresentation

Responses have been made above as to all three defenses.

Certification of Discovery Responses

Please include a signed copy of this form with your discovery responses

I, shahid anwar, certify that the enclosed material is accurate, complete, and truthful to the best of my knowledge.



06/26/2025

Signature **Date**

Glossary

- **Adverse inference:** A negative conclusion that's drawn from silence or the failure to provide responsive information.
- **Discovery:** The process by which the parties exchange information and documents relevant to the issues in the case.
- **Harm:** What the claimant has suffered or lost as a result of respondent's actions.
- **Privileged:** Any confidential communications with legal counsel reflecting or seeking legal advice about the merits of a proceeding or other legal issue.
- **Responsive:** Documents that are requested for production in response to discovery requests.
- **Request for the production of documents:** Written requests provided by the CCB that require parties to provide documents, other information, or evidence as part of discovery in an active proceeding.
- **Sanctions:** Penalties imposed by the CCB for misconduct during proceedings.
- **Witness:** Someone with personal knowledge about factual information that is relevant to the proceeding.

Docket number: 24-CCB-0214
Date: October 1, 2025

Saad Hashmami	v.	Shahid Anwar, LLC
CLAIMANT		RESPONDENT

RESPONDENT, SHAHID ANWAR'S ANSWERS TO CLAIMANT, SAAD HASMANI'S ADDITIONAL DISCOVERY INTERROGATORIES AND DOCUMENT REQUESTS

A. Interrogatories to Be Answered by Parties Defending Against a Misrepresentation Claim

1.Identify all individuals who contributed to the creation of the allegedly infringed work(s), including the nature of their contributions, and the manner in which they were assigned to the Defendant.
ANSWER: The allegedly infringed work is a TikTok video that I personally created and published. The video was filmed by me using the front camera of my smartphone. I am the sole creator of the video, and no other individuals contributed to its creation.
The other party copied and uploaded my TikTok video to their YouTube channel without my authorization. That infringing upload has since been taken down.

2. Identify the name of the videographer and the date of the videography for each video you claim you have a copyright in.
ANSWER: There was no videographer involved in the creation of the video(s). The content in question is a short TikTok video (approximately 1–2 minutes in length) that I personally filmed using the camera on my smartphone.

3. State whether each of the allegedly infringed works was created as a work made for hire and if so by whom.
ANSWER: The allegedly infringed work was **not created as a work made for hire**. It was created solely by me, in my personal capacity, using my smartphone for publication on my TikTok account.

4. List all persons or entities to whom rights in the work have been licensed from or assigned to, with dates and terms.
ANSWER: No rights in the allegedly infringed work have been licensed or assigned to any persons or entities. I retain full ownership of the work.

EXHIBIT 8 tabbies

5. Identify any other DMCA takedown notices or counter-notices submitted by Respondent regarding the same or similar work(s), from June 8, 2023, to June 8, 2024, and the outcome of the notice.
ANSWER: Yes, I submitted a DMCA takedown notice to the individual who uploaded my TikTok videos on their YouTube channel without authorization. As a result of the notice, YouTube removed the infringing videos.

6. State whether you conducted any analysis or consideration of fair use before submitting the takedown notice and if so, describe in detail what factors you considered, and the conclusion reached providing your analysis.
ANSWER: Before submitting the DMCA takedown notice, I considered the factors of fair use. I reviewed whether the alleged infringing use:

1. **Purpose and character of the use:** The infringing videos were uploaded by the other party for their own distribution on YouTube and were not transformative. They directly reproduced my original content for public viewing without adding commentary, criticism, or new expression.

2. **Nature of the copyrighted work:** The original work is a creative TikTok video that I personally produced.

3. **Amount and substantiality of the portion used:** The entire video was reproduced in full.

4. **Effect upon the potential market:** Unauthorized copies on YouTube could harm the original work's distribution and viewership, as well as my ability to monetize or control its use.

Based on this analysis, I concluded that the use by the other party did **not qualify as fair use,** which led me to submit the DMCA takedown notice.

7. Identify any person or resource (excluding legal counsel or privileged information) you consulted before sending the takedown notice with regard to whether the Claimant's use was fair use and whether your primary concern was that the Claimant's use constituted defamation of the individual appearing in the video rather [than] the copyright [infringement].
ANSWER: Before submitting the DMCA takedown notice, I did not consult any external person or resource, excluding legal counsel. My primary concerns in sending the takedown notice were:

1. **Copyright Infringement:** The individual uploaded my TikTok videos without authorization and used them on their YouTube channel to promote their own content and courses.

2. **Defamation and Misrepresentation:** The videos were being used in a manner that misrepresented me and my online university. I operate a legitimate online education platform with an app available on the App Store and Google Play, with over 1 million

downloads. The infringing party was attempting to use my content to defame us and to mislead viewers into buying their own courses.

The combination of unauthorized use and defamation was the reason for submitting the takedown notice.

B. Document Requests to Be Responded to by Parties Defending Against a Misrepresentation Claim

1. All copyright registration certificates, applications, and deposit copies for the allegedly infringed work(s), if any.
RESPONSE: I do not have any formal copyright registration certificates, applications, or deposit copies for the allegedly infringed work(s). The work in question is an original TikTok video that I personally created and published.

2. All work-for-hire agreements or employment agreements with the videographers or producers of the allegedly infringed works.
RESPONSE:There are no work-for-hire agreements or employment agreements with any videographers or producers of the allegedly infringed work(s), as I am the sole creator of the TikTok video in question.

3. Original digital source files establishing authorship or creation of the work.
RESPONSE:The original digital source file establishing authorship of the work is the TikTok video itself, which I personally filmed using my smartphone. No other source files or materials were involved in the creation of the work.

4. All non-privileged documents reflecting any fair use analysis, determination, or discussion prior to submitting the takedown notices.
RESPONSE:There are no non-privileged documents reflecting any fair use analysis, determination, or discussion prior to submitting the takedown notice. The decision to submit the notice was based on my personal review and consideration of the unauthorized use of my TikTok video and its misuse to promote another party's courses and defame my online university.

6. Any non-privileged templates, internal forms, or standard operating procedures used by Respondent when preparing takedown notices that address (or omit) fair use.
RESPONSE:No non-privileged templates, internal forms, or standard operating procedures were used when preparing the takedown notice. The notice was drafted and

submitted personally by me, based on my review of the unauthorized use of my TikTok video and its misuse to promote another party's courses and defame my online university.

Certification of Discovery Responses

I, Shahid Anwar, certify that the enclosed material is accurate, complete, and truthful to the best of my knowledge.



Signature

09/17/2025

Date

#6506923v1

Docket number: 24-CCB-0214
Date: October 8, 2025

Saad Hashmani	v.	Shahid Anwar, LLC.
CLAIMANT		RESPONDENT

RESPONDENT, SHAHID ANWAR'S SUPPLEMENTAL ANSWERS TO CLAIMANT, SAAD HASMANI'S ADDITIONAL DISCOVERY INTERROGATORIES AND DOCUMENT REQUESTS

A. Interrogatories to Be Supplemented

2. Identify the name of the videographer and the date of the videography for each video you claim you have a copyright in.
SUPPLEMENTAL ANSWER:

Original Video 1: 5-31-24

Original Video 2: 6-2-24

Original Video 3: 6-6-24

5. Identify any other DMCA takedown notices or counter-notices submitted by Respondent regarding the same or similar work(s), from June 8, 2023, to June 8, 2024, and the outcome of the notice.
SUPPLEMENTAL ANSWER:

The only takedown notices Respondent submitted relating to same or similar work is against the Claimant Saad Hashmani. The takedowns were submitted on the following dates: Jun 5, 2024, Jun 8, 2024. Given that Respondent could not locate the third takedown notice, he cannot say for certain when that was submitted but it was around the time of the other two.

Respondent is not aware of any other factual outcomes other than YouTube removing the videos for each takedown submission. Respondent is aware that Claimant's channel was disabled, pursuant to YouTube's rules and regulations.



6. State whether you conducted any analysis or consideration of fair use before submitting the takedown notice and if so, describe in detail what factors you considered, and the conclusion reached providing your analysis.

SUPPLEMENTAL ANSWER:

Respondent used his experience in his career as a youtuber who has submitted DMCA Takedown Notices previously to conduct the analysis. No other materials were reviewed other than watching the videos and relying on past expertise to conduct the fair-use analysis.

B. Document Requests to Be Supplemented

3. Original digital source files establishing authorship or creation of the work.
SUPPLEMENTAL RESPONSE:

Respondent directly filmed and uploaded the videos to the TikTok platforms, as such, he does not have the original digital source files in his possession, custody, or control.

Certification of Discovery Responses

I, Shahid Anwar, certify that the enclosed material is accurate, complete, and truthful to the best of my knowledge.

Shahid anwar

01/15/2025

By: Shahid Anwar
Title: Member
Shahid Anwar LLC

Date

Docket number: 24-CCB-0214
Date: November 25, 2025

Saad Hashmani	v.	Shahid Anwar, LLC.
CLAIMANT		RESPONDENT

RESPONDENT, SHAHID ANWAR LLC'S SUPPLEMENTAL ANSWERS TO CLAIMANT, SAAD HASMANI'S ADDITIONAL DISCOVERY INTERROGATORIES AND DOCUMENT REQUEST OCTOBER 8, 2025, CORRESPONDENCE

Respondent respectfully submits this correspondence as response to Claimant's October 8, 2025, Letter regarding Respondent's Supplemental Discovery Responses dated October 1, 2025, and October 8, 2025. Respondent hopes that the following supplemental answers provide further clarification to Claimant's requests.

1. Ownership: Identify whether copyrights are owned personally or by the LLC

SUPPLEMENTAL ANSWER:

Copyright is held by Shahid Anwar personally. No assignment has been made to the LLC. However, he is the sole member of Shahid Anwar LLC.

2. DMCA Filings: Identify account name/email used and signer of each notice

SUPPLEMENTAL ANSWER:

Username: Shahid Anwar
Email: shahidanwaaar@gmail.com
Signer: Shahid Anwar

The source of the videos was the TikTok account named: ShahidAnwarLLC.com.

The initial takedowns occurred over a year ago, in 2024. Respondent has located two out of the three notice submission confirmation emails from YouTube. It has been unable to find the third notice or email confirming the third DMCA Takedown submission.

3. Source Files: State whether original device files still exist and when deleted if not

SUPPLEMENTAL ANSWER:

EXHIBIT
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To further answer Claimant's issues within Paragraph 2 "Missing or Contradictory Information on Source" in his October 8, 2025 Letter, Claimant's understanding of Respondent's answer is incorrect. TikTok allows for creators to access their phone camera and film content directly on the app, edit it, and upload it. Thus, there is no requirement to take a video on your phone, save it to your photos, and then upload it to TikTok. This is why there is no "original digital source file," outside of TikTok. Shahid Anwar filmed the contents and uploaded them directly.

The digital videos provided by Respondent from the TikTok account are the only digital source files available to it or anyone else, as there are no other versions saved to any devices. No files have been deleted or otherwise spoliated as they do not exist outside of the TikTok app.

4. Fair Use: Identify who performed any analysis for the LLC

SUPPLEMENTAL ANSWER:

Shahid Anwar, as the sole member of Shahid Anwar LLC, performed the fair-use analysis on behalf of the LLC. There is no documentation of analysis performed.

5. Certification: Provide proper officer-signed verification

SUPPLEMENTAL ANSWER:

See below.

Certification of Discovery Responses

I, Shahid Anwar, certify that the enclosed material is accurate, complete, and truthful to the best of my knowledge.



11/25/2025

By: Shahid Anwar
Title: Member
Shahid Anwar LLC

Date

Proof of Delivery

I hereby certify that on Tuesday, May 26, 2026, I provided a true and correct copy of the Evidence Exhibits to the following:

Saad Hashmami, represented by Kenneth N Caldwell, served via ESERVICE at kcaldwell@caldwell-law-firm.com

Signed: /s/ Natalia Micheli